

FILED

JUL 22 2019

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:19 MJ 6189 PLC
	)	
THOMAS LAMAR PERRY,	)	
	)	
Defendant.	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Howard J. Marcus, Assistant United States Attorney, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with 18 U.S.C. §1591(a) and 2, did in or affecting interstate commerce, knowingly recruit, entice, provide, obtain and transport a person under the age of 18 knowing that would be caused to engage in a commercial sex act.
2. Pursuant to U.S.C. Sections 1341(e)(3), and subject to rebuttal by the person, it shall be presumed that no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of the community if

the judicial officer finds that there is probable cause to believe that the person committed-

(E) an offense involving a minor under Section 1591.

3. There is a serious risk that the defendant will flee if released on bond.

4. The defendant is a threat to the community as the offense involved the acquisition and offering of a 16 year old minor for the purposes of a commercial sex act.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN  
UNITED STATES ATTORNEY

/s/ Howard J. Marcus  
HOWARD J. MARCUS, 29756MO  
Assistant United States Attorney